



Chicago
New York
Washington, DC
London
San Francisco
Los Angeles
Singapore
Dallas
Miami
vedderprice.com

January 18, 2024

Adam L. Schwartz
Shareholder
+1 (786) 741 3240
aschwartz@vedderprice.com

VIA ECF

Honorable Victor Marrero
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *United States v. Shakeeb Ahmed*, 23 Cr. 340 (VM)
Unopposed Motion to Modify Pretrial Release

Dear Judge Marrero:

On behalf of Defendant Shakeeb Ahmed, and with the consent of the government and the Office of Pretrial Services, we respectfully request that the Court modify the conditions of Mr. Ahmed's presentencing release, which are the same conditions entered by the Court on August 17, 2023. (*See* ECF No. 17.) Mr. Ahmed's current release conditions include a curfew set by the Pretrial Services Office, GPS Monitoring, and travel restricted to the Southern and Eastern District of New York. Mr. Ahmed requests that the curfew and electronic monitoring conditions be removed. Mr. Ahmed's travel will remain restricted to the Southern and Eastern District of New York.

On December 14, 2023, Mr. Ahmed plead guilty to the Superseding Information. (ECF No. 27.) Currently, Mr. Ahmed's sentencing is scheduled for April 12, 2024 at 10:00 AM. (ECF No. 31.) Mr. Ahmed requests modification of his release conditions so that he can adequately prepare for sentencing. Mr. Ahmed has been in full compliance with the terms of his release since release conditions were first imposed on July 11, 2023. Additionally, Mr. Ahmed is a United States citizen with significant ties to the area.

Counsel for Mr. Ahmed conferred with Pretrial Services Officer Dominique Jackson on January 17, 2024, and she had no objection to the requested modifications. Additionally, on January 17, 2024, Assistant United States Attorney David Felton advised the undersigned that the government had no objection to proposed modifications.

It is respectfully requested that this Court grant Mr. Ahmed's application modifying his release conditions as follows:

1. The curfew requirement is stricken;

Honorable Victor Marrero

January 18, 2024

Page 2

2. The GPS monitoring requirement is stricken; and
3. Mr. Ahmed's travel will continue to be restricted to the Southern and Eastern Districts of New York.

The entry of the foregoing conditions is without prejudice to a future application by Mr. Ahmed or the government.

Respectfully submitted,

/s/ Adam L. Schwartz

Adam L. Schwartz

aschwartz@vedderprice.com

Junaid A. Zubairi (admitted *pro hac vice*)

jzubairi@vedderprice.com

Samuel M. Deau (admitted *pro hac vice*)

sdeau@vedderprice.com

Vedder Price, P.C.

600 Brickell Avenue, Suite 1500

Miami, Florida 33131

786-741-3240

Bradley J. Bondi

bradbondi@paulhastings.com

Sarah E. Ortiz

saraortiz@paulhastings.com

Paul Hastings LLP

200 Park Avenue

New York, NY 10166

Attorneys for Defendant

Shakeeb Ahmed

Cc:

All counsel of record via ECF